

Standards Committee T1

Carrier Liaison Committee

Telecommunications
Industry Forum

Ordering and Billing
Forum

Network Interconnection
Interoperability Forum

Industry Numbering
Committee

Protection Engineers
Group

Standards Committee O5

Network Reliability
Steering Committee

Internetwork
Interoperability Test
Coordination Committee

Telecommunications
Fraud Prevention
Committee

Generic Requirements
Users Group

International Forum on
ANSI-41 Standards
Technology

Interactive Voice
Response Forum

TTY Forum

Administrative Council for
Terminal Attachments

IMSI Oversight Council

June 26, 2002

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: CC Docket No. 94-102

Dear Ms. Dortch:

The Alliance for Telecommunications Industry Solutions ("ATIS") hereby files this Consensus Statement on behalf of its sponsored TTY Forum.

Pursuant to the Commission's rules, I am filing one electronic copy of this Consensus Statement and request that you place it in the record of the proceedings. Please contact me at 202/434-8830, or Ed Hall, Chair of the TTY Forum, at 202/434-8836 if you have any questions or comments.

Sincerely,

Toni E. Haddix
ATIS Staff Attorney

Attachment

cc: Thomas J. Sugrue, Bureau Chief, WTB (tsugrue@fcc.gov)
James D. Schlichting, Deputy Chief, WTB (jschlich@fcc.gov)
Barry Ohlson, Chief, Policy Division, WTB (bohlon@fcc.gov)
Mindy Littell, Attorney Advisor, Policy Division, WTB, TTY Forum
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Pamela Gregory, Director, Disabilities Rights Office, CIB
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Sponsored by the Alliance for
Telecommunications Industry Solutions
(ATIS)

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June 26, 2002

TTY Forum Consensus Statement Regarding Roll-out of Digital Wireless TTY Services

The Alliance for Telecommunications Industry Solutions (“ATIS”)-sponsored TTY Forum is pleased to announce the successful deployment of TTY services by many digital wireless carriers. Since September 1997, the ATIS-sponsored TTY Forum has worked to develop technically feasible solutions that will enable TTY users to make TTY calls over digital wireless systems. The Forum is comprised of various stakeholders, including wireless carriers, wireless handset manufacturers, wireless infrastructure manufacturers, manufacturers of Text Telephones (“TTYs”), emergency and relay service providers (9-1-1 and TRS), and consumer organizations representing people with hearing and speech disabilities.

Through an intense collaborative effort, the Forum has been successful in helping to create and test standards that allow for TTY transmission over digital wireless networks. At the most recent Forum meeting on June 4, 2002, many wireless service providers reported that they are prepared to meet the Federal Communications Commission’s (“FCC”) June 30, 2002 deadline for TTY compatibility. Moreover, testing has shown that digital wireless TTY consistently performs better than TTY over analog circuits (AMPS).

TTY over digital wireless is a major accomplishment. TTY devices, which have been in use since 1964, were designed specifically for use over analog networks. To enable the TTY calls over digital voice channels, digital wireless handsets and networks had to be redesigned to accommodate the speed and tone of TTY Baudot signals. Numerous problems had to be overcome, including setting standards for the interface between TTY devices and digital wireless mobile phones. The TTY Forum worked in concert with standards developing organizations (ATIS T1 and TIA TR45) to ensure that standards were created for each wireless technology - CDMA, GSM, TDMA, and iDen. Once standards were developed, the Forum set minimum performance criteria, and worked in unison to ensure that wireless network and handset manufacturers’ TTY solutions met this criteria. The Forum also established the TTY Technical Standards Implementation (TTSI) incubator program, which established TTY testing parameters and coordinated testing events in order to find, isolate, and resolve TTY issues.

The TTY Forum is an unprecedented example of the industry cooperating to reach a specific goal. The user community was able to provide input at an early enough time for inclusion in the development process. Service providers and vendors pooled their resources, shared information, and worked towards common resolutions to problems. The TTY Forum thus proved to be an indispensable centralized point that greatly assisted carriers and vendors in delivering a very high quality product that met the FCC mandate in a timely fashion.

The TTY Forum's primary goal has been to develop acceptable solutions that will meet the FCC's requirement (CC Docket No. 94-102) that wireless carriers be capable of connecting 9-1-1 calls over a digital wireless digital network originated by individuals with speech or hearing

disabilities, when using TTYs. While wireless TTY compatibility services work well for non-emergency communication, there are some remaining issues that exist for emergency situations. Wireless 9-1-1 TTY calls may suffer high character error rates (CER) when received by some Public Service Answering Points (PSAPs). Test results from the ATIS-sponsored TTSI incubator show that the problem encountered may be related to older and non-standardized TTY equipment or software used by some PSAPs. The wireless telecommunications industry has performed due diligence to ensure that the digital network will be capable of transmitting TTY calls by the June 30, 2002 deadline and is committed to continue to work to provide access to 9-1-1 for their customers using TTYs.

The wireless industry is pleased to offer some of the latest advances in TTY technology, bringing people with hearing and speech disabilities closer to full communication mobility. Many TTY users will discover and enjoy the tremendous benefits of digital wireless technology as a result of this achievement. As is necessary with many evolving technologies, the wireless industry remains committed to further refining and improving TTY systems for greater reliability and ease of use.